

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

**IN RE: CORINNE E. ZATKOS fla CORINE ROBINSON      CASE NO. 1-17-01106**  
**Debtor**

**TOYOTA MOTOR CREDIT CORPORATION**  
**Movant**

**CHAPTER 13**

**v.**

**CORINNE E. ZATKOS fla CORINE ROBINSON**  
**Debtor**

**CHARLES J. DEHART. III, ESQ.**  
**Trustee**

**ANSWER TO MOTION OF TOYOTA MOTOR CREDIT CORPORATION FOR RELIEF FROM THE STAY**

1. ADMITTED.
2. ADMITTED.
3. ADMITTED.
4. ADMITTED.
5. ADMITTED.
6. Denied that Debtor has failed to make monthly post-petition payments for the months of August 2017 through October 2017.

7. ADMITTED.
8. DENIED that the Automatic Stay should be lifted and that Movant lacks adequate protection of its interest in the Vehicle .
9. Denied that Debtor should be entitled to a waiver of Bankruptcy Rule 4001(a)(3).

**WHEREFORE** Debtor requests Movant's Motion for Relief be denied.

/s/ Larry W. Wolf, Esq.  
215 Broadway  
Hanover, PA 17331  
Phone Number: (717) 632-0067